

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING

OCT 31 2022

11:22 AM  
Margaret Botkins, Clerk  
Cheyenne

**Bret T Allred**  
117 N Bent St, Powell, WY 82435  
Telephone: 307-271-1034  
Email: [bret@YellowstoneLawGroup.com](mailto:bret@YellowstoneLawGroup.com)  
*For the Defendant*

---

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF WYOMING**

KAYTLYN WILSON MARTINEZ

*Plaintiff,*

Civil Action No: 21-CV-101-KHR

ROCKY MOUNTAIN RECOVERY SYSTEMS, INC.,  
A Wyoming Corporation,

*Defendant.*

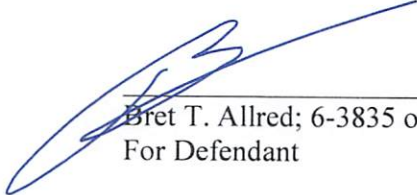
**DEFENDANT'S STATUS  
UPDATE ON STATE COURT  
ACTION**

---

Defendant, Rocky Mountain Recovery Systems, Inc. ("RMRSI"), by and through undersigned counsel, and pursuant to the Court's ORDER GRANTING DEFENDANT'S MOTION TO DISMISS IN PART: (Docket Entry 11), hereby provides the court with an update on the status of the parallel proceeding being litigated in state court by stating.

1. The Plaintiff has declared bankruptcy and so the state court action is closed.
2. The claim filed in circuit court has been dismissed without prejudice as of May 4, 2022.
3. If the Plaintiff does not dismiss the case in this court, we believe the prudent course of action would be to lift the stay so the Defendant can file counterclaims and Rule 11 motions to avoid repetitive status reports in perpetuity.

**DATED** this 28 day of October 2022.

  
\_\_\_\_\_  
Bret T. Allred; 6-3835 of counsel  
For Defendant

**CERTIFICATE OF SERVICE**

I, Bret T. Allred, certify that on this 28 day of October 2022 I caused a copy of the above document to be served upon the Defendants by depositing the same with this U.S. Postal Service and addressed as follows:

Kaytlyn Martinez  
ATTN: Seth Shumaker  
2 N. Main, Ste. 103  
Sheridan WY 82801



---

Bret T. Allred

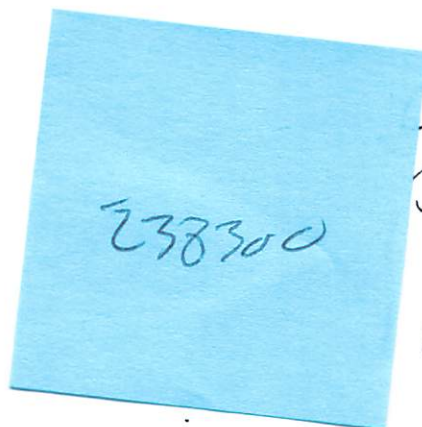
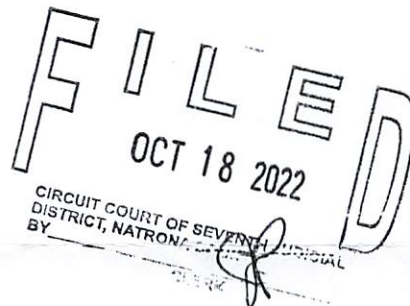
To Whom it may Concern;

You have the wrong person, I was not in the state of Wyoming at the time of service provided.

Thank you for your time,

Kory Shira

CV 2022-2700



my to IT

27

8 oct 2022

**WILKERSON & WILKERSON, LLC**

ATTORNEYS AT LAW  
210 N. BENT STREET  
POWELL, WYOMING 82435

ADDRESS SERVICE REQUESTED



**US POSTAGE** IMPITNEY BOWES



ZIP 82435 \$ 000.57<sup>0</sup>  
02 4W  
0000351557



2120 Capitol Avenue  
Room 2131  
Cheyenne, WY 82001

8200183658 C015

